



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99352 • (509) 372-7950

January 22, 2006

Mr. Roy J. Schepens, Manager
Office of River Protection
United States Department of Energy
P.O. Box 450, MSIN: H6-60
Richland, Washington 99352

Mr. William S. Elkins, Project Director
Bechtel National, Inc.
2435 Stevens Center Place, MSIN: H4-02
Richland, Washington 99354

Re: Hanford Facility RCRA Permit Modification Notification Form 24590-LAW-PCN-ENV-05-002; Class ¹1 Modification to the Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit, Dangerous Waste Portion for the Treatment, Storage, and Disposal of Dangerous Waste, Part III, Chapter 10 (Waste Treatment and Immobilization Plant), WA7890008967

Dear Mr. Schepens and Mr. Elkins:

The Department of Ecology approves the referenced Class ¹1 Modification submitted by the United States Department of Energy – Office of River Protection. The approved Hanford Facility RCRA Permit Modification Notification Form is enclosed.

Modification 24590-LAW-PCN-ENV-05-002 provides the updated Process and Instrumentation Diagram for the Low-Activity Waste Radioactive Liquid Waste Disposal System C3/C5 Floor Drains Collection, 24590-LAW-M6-RLD-P0003 Revision 2 in Appendix 9.2 of the Reference.

If there are any questions, contact me at 509-372-7882 or Tracy Gao at 509-372-7901.

Sincerely,

Brenda Becker-Khaleel
WTP Permit Lead
Nuclear Waste Program

mam:jc
Enclosure

cc: See next page

Mr. Schepens and Mr. Elkins
January 22, 2007
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cc/electronic w/enc:

Robert Barr, USDOE
John Eschenberg, USDOE
Lori Huffman, USDOE
Tony McKarns, USDOE
Gae Neath, USDOE
Don Sommer, USDOE
Julie Atwood, BNI
Brad Erlandson, BNI
Peggy Fisher, BNI
Stan Hill, BNI
Dennis Klein, BNI
Sandi Murdock, BNI
Phil Peistrup, WGI

cc w/enc:

Administrative Record: Tank Waste Treatment Requirements
Environmental Portal ✓
USDOE-ORP Correspondence Control

Quarter Ending 12/31/06

24590-LAW-PCN-ENV-05-002

Hanford Facility RCRA Permit Modification Notification Form

Unit:

Waste Treatment and Immobilization Plant

Permit Part & Chapter:

Part III, Chapter 10 and Attachment 51

Description of Modification:

Due to the large number of minor changes, the permit P&ID has undergone a major revision. As such, change clouds are not provided on the P&ID. A detailed description of changes since the last revision of 24590-LAW-M6-RLD-P0003 is provided in this permit modification form.

- Slope symbols were added to various piping. (See attached DCNs for details).
- Revised off-sheet connector text and off-sheet connector descriptions (equipment names). See Item 1 of DCN RLD-00033 and Items 3 and 6 of DCN RLD-00036 for details
- Re-configured piping for ASX drain lines from ASX-SMPLR-00012 and ASX-SMPLR-000-00013 and changed flow from samplers to drain RLD-FD-00121. [Coord. G-8] See Item 6 from DCN RLD-00002 and Item 2 of DCN RLD-00036 for details

The following changes occur at the +3 Elevation:

- The following floor drains have been changed to non-regulated drains because they are designed to manage fire suppression system water and other non-DWP regulated liquids, and are not designed to manage dangerous waste: RLD-FD-00027 [Coord. E-3], RLD-FD-00019 [Coord. E-3], RLD-FD-00039 [Coord. E-3], RLD-FD-00038 [Coord. E-3], RLD-FD-00032 [Coord. E-4], RLD-FD-00037 [Coord. E-4], RLD-FD-00033 [Coord. E-5], RLD-FD-00034 [Coord. E-5], RLD-FD-00036 [Coord. E-6]

The following changes occur at the +28 Elevation:

- The drain lines from the following floor drains have been changed to non-regulated drains because they are designed to manage fire suppression system water and other non-DWP regulated liquids, and are not designed to manage dangerous waste: RLD-FD-00014 [Coord. F-7], RLD-FD-00015 [Coord. F-7].
- Non-regulated fan coil condensate drain line C3V-FCU-00020 was eliminated from the +28 elevation with the issuance of Revision 3 of the source 24590-LAW-M6-RLD-00003 drawing. (See sheet 2 of 3 of DCN-RLD-00002, Coord F-8). Non-regulated fan coil condensate drain line C3V-FCU-00019 was removed from the +28 Elevation, and was added to the +48 elevation header at Coord. H-7. The C3V-FCU-00037 was deleted and replaced with C3V-ACU-00002 located at +48 elevation Coord. H-5.

The following changes occur at the +48 Elevation:

- Floor drain RLD-FD-00109 (room 304E) was re-numbered and relocated and is now RLD-FD-00185 (room 304A). This drain line was also changed to a non-regulated line because it is designed to manage fire suppression system water and other non-DWP regulated liquids, and is not designed to manage dangerous waste. [Coord. H-4]

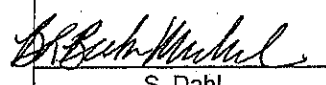
¹ Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class 1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

- Drain lines from the following were added and drain to the RLD-VSL-00004 header at +48: RLD-FD-00025 (regulated condensate drain line from caustic scrubber room) [Coord. H-3], LVP Stack condensate drain line (regulated) [Coord. H-5]. The following air conditioning unit and fan coil unit condensate drains, C3V-ACU-00001 (non-regulated) [Coord. H-5], C3V-ACU-00002 (non-regulated) [Coord. H-5], C3V-ACU-00003 (non-regulated) [Coord. H-5], RLD-PMP-00202 (non-regulated) [Coord. H-4], C3V-FCU-00031 (non-regulated) [Coord. H-7], C3V-FCU-00027 (non-regulated) [Coord. H-6], C3V-FCU-00029 (non-regulated) [H-5], C3V-FCU-00030 (non-regulated) [Coord. H-4], C3V-FCU-00028 (non-regulated) [Coord. H-3], C3V-FCU-00033 (non-regulated) [Coord. G-2], C3V-FCU-00034 (non-regulated) [Coord. G-2] were also added and drain to the RLD-VSL-00004 header at the +48' elevation.
- The drain lines from the following have been changed to non-regulated status because they are designed to manage fire suppression system water and other non-DWP regulated liquids, and are not designed to manage dangerous waste: RLD-FD-00182 [Coord. H-7], RLD-FD-00181 [Coord. H-6], RLD-FD-00180 [Coord. H-6], RLD-FD-00024 [Coord. H-6], RLD-FD-00023 [Coord. H-6], RLD-FD-00016 [Coord. H-5], RLD-FD-00121 [Coord. H-8], RLD-FD-00012 [Coord. H-4], RLD-FD-00013 [Coord. HG-3], RLD-FD-00185 [Coord. H-4]

Please replace the following in Appendix 9.2 of the Dangerous Waste Permit

Appendix 9.2			
Replace:	24590-LAW-M6-RLD-P0003, Rev. 1	With:	24590-LAW-M6-RLD-P0003, Rev. 2

WAC 173-303-830 Modification Class: ^{1 2}	Class 1	Class ¹ 1	Class 2	Class 3
Please mark the Modification Class:		X		
Enter Relevant WAC 173-303-830, Appendix I Modification citation number: N/A				
Enter wording of WAC 173-303-830, Appendix I Modification citation:				
In accordance with WAC 173-303-830(4)(d)(i), the permittee requests that this modification notification be reviewed and approved as a Class 1 modification. WAC 173-303-830(d)(ii) states, "Class 1 modifications apply to minor changes that keep the permit current with routine changes to facility or its operation. These changes do not substantially alter the permit conditions or reduce the capacity of the facility to protect human health or the environment. In the case of Class 1 modifications, the director may require prior approval."				
Modification Approved: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (state reason for denial)			Reviewed by Ecology:	
Reason for denial:			 S. Dahl	
			1/22/07 Date	